

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JOSHUA WINER,

Plaintiff,

v.

Civil Action File
No. 1:25-cv-02329-TWT

UMAYMAH MOHAMMAD, *et al.*,

Defendants.

**DEFENDANT AJP EDUCATIONAL FOUNDATION, INC. d/b/a
AMERICAN MUSLIMS FOR PALESTINE'S MOTION TO DISMISS
AMENDED COMPLAINT AND FOR AWARD OF ATTORNEYS' FEES**

Pursuant to Rules 12(b)(2) and (6), Defendant AJP Educational Foundation, Inc. d/b/a American Muslims for Palestine (“AMP” or “Defendant”)¹ files its Motion to Dismiss Plaintiff Joshua Winer’s First Amended Complaint for lack of personal jurisdiction and failure to state a claim. Pursuant to the fee-shifting provisions of O.C.G.A. § 9-11-11.1(b), AMP seeks its reasonable attorneys’ fees and litigation expenses in defending against this action designed to curtail AMP’s protected speech.

¹ AMP is a stand-alone organization with no corporate affiliation to separate defendant National Students for Justice in Palestine (“NSJP”). AMP takes no position in this Motion on the veracity of Plaintiff’s claims against NSJP, and responds on its own behalf solely as to the allegations made against AMP.

In support of this Motion, AMP relies on its Brief in Support of Motion to Dismiss and for Award of Attorneys' Fees, as well as the arguments of CAIR-Foundation and CAIR-NGA, in which AMP has joined, as set forth in its Brief in Support. AMP respectfully requests that the Court grant this Motion, dismiss AMP from this action with prejudice, and award its reasonable attorneys' fees and litigation expenses.

DATED: August 5, 2025

Respectfully Submitted,

/s/ James M. Slater

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INC. d/b/a AMERICAN MUSLIMS FOR
PALESTINE**

**The Constitutional Law Center for Muslims
in America is the legal division of the Muslim
Legal Fund of America*

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in Times New Roman 14-point typeface.

Dated: August 5, 2025.

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